

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In Re:

Angela's Bridals, Inc.

Chapter 11 (Sub V)
Case No. 25-10119

Debtor.

**DEBTOR'S EX PARTE APPLICATION TO APPROVE RETENTION OF
ACCOUNTANT TO 11 U.S.C. § 327(a)**

Angela's Bridals, Inc., the Debtor and Debtor-in-Possession herein, (hereinafter the "Debtor"), by and through its attorneys, Boyle Legal, LLC, (Michael L. Boyle, principal), hereby applies to this Court ex parte for an order approving retention of Jill M. Flinton CPA PLLC (hereinafter, "Accountant"), as Accountant for Debtor, pursuant to 11 U.S.C. § 327(a) and in support thereof respectfully show the Court as follows:

1) Debtor filed for Bankruptcy Protection under Title 11 of the United States Code (hereinafter, the "Bankruptcy Code") on February 4, 2025, electing to proceed as a Small Business under Subchapter V of Chapter 11 of the Bankruptcy Code.

2) Debtor desires to employ Accountant as the accountant for the Debtor in the above-captioned Chapter 11 Case.

3) The professional services to be rendered by Accountant, to the Debtor are:

a) Preparation and filing of New York State quarterly sales tax returns and any 2025 income tax returns; and

b) Preparation of Debtor's Monthly Operating Reports

4) Accountant for the Debtor may be called upon to perform duties required as to matters not set forth herein, and, in the event the services of Accountant are required for

unusual or extraordinary matters beyond the scope or intent of this application, additional applications for such Orders will be made by the Debtor, as appropriate.

5) Debtor understands that compensation will be made an hourly rate, for accounting services, subject to Court approval, based upon application to the Court with contemporaneous time records annexed thereto for hourly rate services. Applicant's rates are as follows:

a) Flat Rate Services:

(i) 2025 Income tax returns – fixed fee to be determined in late 2025

b) Hourly Services:

(i) Monthly Operating Reports - \$200 per hour

(ii) Sales tax returns - \$200 per hour

6) While Jill Flinton, CPA, was previously employed by the U.S. Trustee's office, she has not worked there in over 7 years, and had no connection with this case or with this Debtor during her tenure there.

7) Accountant believes that it has no connection with the Debtor, Creditors, with the U.S. Trustee or any person employed in the U.S. Trustee's office or any other party of interest, their respective attorneys and accountants, and therefore, is a Disinterested Party. Annexed hereto and made a part hereof and marked as Exhibit "A" is an Affirmation of Disinterest.

8) Annexed hereto and made a part hereof and marked as Exhibit "B" is a proposed order granting Debtor's request herein to retain Jill M. Flinton CPA PLLC, as Accountant.

WHEREFORE, the Debtor respectfully requests that this Court issue an Order permitting and authorizing Debtor to Employ Jill M. Flinton CPA PLLC as Accountant for Debtor

pursuant to 11 U.S.C. § 327(a) and that Debtor be granted such other and further relief as to the Court may seem just and proper.

Date: May 31, 2025

/s/Michael L. Boyle
Michael L. Boyle
Boyle Legal, LLC
Attorneys for Debtor
64 2nd Street
Troy NY 12180
518-407-3121
mike@boylebankruptcy.com

/s/ Janet Cooper
Janet Cooper
President Sole Shareholder
Angela's Bridals Inc.
Debtor and Debtor-in-Possession

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In Re:

Angela's Bridals, Inc.

Chapter 11 (Sub V)
Case No. 25-10119

Debtor.


**DECLARATION OF JILL FLINTON IN SUPPORT OF APPLICATION TO EMPLOY
ACCOUNTANT**

Jill Flinton, CPA, being duly sworn, deposes and says;

- 1) I am Managing Member of Jill M Flinton CPA PLLC (hereinafter, "Jill Flinton").
- 2) I make this declaration in support of Debtor's application to employ Jill Flinton as accountant and bookkeeper for Debtor.
- 3) Jill Flinton maintains offices at 800 NY-146 Suite 385, Clifton Park, NY 12065.
- 4) Debtor desires to employ Jill Flinton to serve as its Accountant for Debtor.
- 5) Jill Flinton has no business, professional, or other connection to the Debtor-in-Possession, its creditors or any other party in interest and has no interest adverse to the Debtor-in- Possession or to the estate of the Debtor, in the matters upon which to be engaged.
- 6) I was previously employed by the Office of the United States Trustee. I had no involvement during my time of employment with this case or with this debtor.
- 7) Your deponent has been providing tax services for over ten (10) years. As such, your deponent is well suited to provide accounting services to Debtor as an ongoing concern.
- 8) Jill Flinton intends to perform all necessary accounting services in connection with Debtor's ongoing operations during the pendency of Debtor's Chapter 11 Proceeding.
- 9) The Debtor-in-Possession has agreed to pay Jill Flinton at a mixed hourly and flat billing rate, to wit:
 - a) Flat Rate Services:

- i) 2025 Income tax returns – fixed fee to be determined in late 2025
 - b) Hourly Services:
 - i) Monthly Operating Reports - \$200 per hour
 - ii) Sales tax returns - \$200 per hour
- 10) Payment of fees will be made upon application to the Court based upon contemporaneous time records, for hourly services.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



Jill Flinton, CPA
Managing Member
Jill M. Flinton CPA PLLC
*Proposed Accountant for
Debtor-in-Possession*

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In Re:

Angela's Bridals Inc.

Chapter 11

Case No. 25-10119

Debtor.

ORDER APPROVING RETENTION OF
ACCOUNTANT AND BOOKKEEPER

Upon the ex parte application of Angela's Bridals, Inc., the Debtor and Debtor-in-Possession herein, dated June 3, 2025, seeking authorization to employ Jill M. Flinton CPA PLLC as Accountant and Bookkeeper for the Debtor; and upon the Declaration of Jill Flinton in support thereof; and upon the exhibits submitted in support of the application; and no objections having been filed, and the Court having considered the merits of the application, it is hereby

ORDERED, that the Debtor, Angela's Bridals Inc., is authorized to retain Jill M. Flinton CPA PLLC as its Accountant in this case; and it is further

ORDERED, that any payments to Jill M. Flinton CPA PLLC shall be made only upon proper application to the Court and subject to the approval of the Court.

###